





Anne K. Bingaman  
Senior Vice President  
President, Local  
Telecommunications Division

June 9, 1997

VIA FAX

Mr. Neil Cox  
President  
Ameritech Information Industry Services  
350 North Orleans, Floor Three  
Chicago, Illinois 60654

Dear Neil:

I am writing to respond to your letter of May 28, 1997 offering LCI the opportunity to "observe" AT&T's operational trial. My understanding is that this offer is intended as a substitute for LCI conducting its own trial, which we requested beginning in February, 1997.

As my May 23, 1997 letter to you reflects, you informed me when we met on May 28, 1997 that your responsibilities included the UNE Platform; that you were aware of LCI's meetings with Mr. Wynn; and that Ameritech in fact understood the test LCI proposed to conduct, but would not be able to conduct a test with LCI because Ameritech did not have sufficient engineering staff to conduct a trial with more than one company at the same time.

You also said that because a network platform test is ongoing with AT&T, Ameritech could not conduct a second, simultaneous test with LCI. You did, however, offer to inquire as to whether LCI could be admitted as an observer to the AT&T test. I told you I had been only vaguely aware that a test with AT&T might be ongoing, that I appreciated your candid response, and that LCI would very much like to be admitted as an observer if it could not currently conduct its own test due to Ameritech's lack of personnel. On May 28, 1997, you confirmed that LCI could observe the AT&T trial, if AT&T consented to it.

We have now had a chance to study Ameritech's Kocher Affidavit, and to talk to Mr. William Davis of AT&T. We have concluded that the AT&T test is too limited and unsettled to know whether it will demonstrate the issues LCI asked you to address in our original meeting on February 28, 1997.

EX. 17

Further, frankly, I find it distressing that a company of Ameritech's size and scale would not have the engineering personnel available to conduct more than one test of the network platform at a time. It is an understatement to say that this does not bode well for Ameritech's ability to scale up, in short order, to commercial availability of the network platform.

As we have stated repeatedly throughout our meetings and exchanges of letters, LCI needs and wants to gain the OSS and back office experience for itself. Participating in the current limited AT&T test -- a much larger carrier with completely different back office staffing -- in no way adequately prepares LCI to compete in the local market using the important network platform. LCI accordingly reiterates its long-standing request that Ameritech test with it, independently, the network platform in Illinois and Michigan.

As to the AT&T trial itself, we note that that test is structured into two phases. Our understanding of the initial phase is that it does not test platform-related objectives, other than to determine whether line orders can be processed electronically using an EDI interface. The Phase I test will not address, for example, the application of access or reciprocal compensation charges, and, as such, will not provide results which would prepare either Ameritech or LCI for commercial scale operations.

The second phase of the AT&T trial, which as we understand it, remains inchoate and is still to be negotiated, appears to have the potential at least to address a number of more useful objectives. Although the information available to LCI (a four page letter from William Davis of AT&T to John Lenahan of Ameritech) is insufficient to determine the proposed scope of Phase II of the trial, our review of the correspondence suggests there would be at least one difference, if not more, between AT&T's proposed trial and LCI's request. This area concerns the procedures that would be used by Ameritech and LCI to bill for the switched access services that would be used by interexchange carriers to terminate traffic to LCI's end users.

LCI expects that most (if not all) interexchange carriers would continue to purchase access-transport service from Ameritech, while obtaining local switching and common line services from LCI. Because under these conditions LCI and Ameritech will be jointly providing switched access service, LCI believes that a successful test must

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\* Because the basic structure of the AT&T request and LCI's are similar, there may be areas of the test which will be relevant to our own plans and, as such, LCI has contacted AT&T to participate as an observer. Agreeing to participate in this manner, however, is not sufficient to prepare LCI for local entry and is not an acceptable substitute to LCI conducting its own trial.

Mr. Neil Cox  
June 9, 1997  
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include a meet-point billing arrangement with Ameritech. LCI's primary interest is an arrangement based on the "single bill/multiple tariff" framework. LCI would be willing, however, to discuss a "single bill/single tariff" structure if such an approach would be more consistent with Ameritech's operational abilities.

Without additional information from Ameritech concerning the Phase II test, LCI is unable to determine in what other respects its request might differ (in structure or in emphasis) from that of AT&T. Even our limited review, however, makes clear that participating as an observer to the trial of another carrier -- particularly a carrier that LCI expects to be a formidable competitor to it in the local market -- is not acceptable to LCI. Thus, even if the AT&T test were designed to test each of the parameters that LCI might identify, the AT&T test does not satisfy a major and ongoing objective of LCI -- for LCI to test and learn for itself the OSS, back office systems, and practical workability of all aspects of the network platform in the Ameritech region.

To reiterate, we have requested for several months that Ameritech conduct an operational trial with LCI. We renew that request here.

I look forward to your reply.

Sincerely,

A handwritten signature in cursive script, reading "Anne K. Bingaman". The signature is fluid and elegant, with a large initial "A" and a long, sweeping tail.

Anne K. Bingaman

AKB:slg

C

EXHIBIT C

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of:

Application of Ameritech Michigan Pursuant to  
Section 271 of the Telecommunications Act of  
1966 to Provide In-Region, InterLATA Services in  
Michigan

CC Docket No. 97-137

**AFFIDAVIT OF WAYNE CHARITY  
ON BEHALF OF LCI INTERNATIONAL TELECOM CORP.**

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**AFFIDAVIT OF WAYNE CHARITY  
ON BEHALF OF LCI INTERNATIONAL TELECOM CORP.**

I, Wayne Charity, being first duly sworn do hereby depose and state:

1. I am employed by LCI International Telecom Corp. ("LCI") as Director of Operations and Engineering for the Local Services Division. At LCI, I am responsible for defining and supervising the development and operation of the back-office systems and procedures to support LCI's local telephone services business. I oversee the development of software interfaces to enable LCI to communicate electronically with the operations support systems ("OSS") of the incumbent local exchange carriers ("ILECs") in those states in which LCI is selling (or intends to sell) local telephone services. I am also responsible for trouble-shooting and attempting to resolve problems that are caused to LCI's local services business by the ILECs OSS and interfaces to their OSS.

2. I have over 16 years of experience in the development and operation of back-office systems for telecommunications carriers. Before joining LCI, I was employed at various times by different companies, including COMPUS Services, ONCOR Communications, Intelicom Solutions, National Telephone Services and Telic Corporation, with principal responsibility for establishing new back-office systems and procedures, or modifying existing systems and procedures, to support telecommunications businesses. During the course of my 16 years in the



industry, I have become familiar with the operation support systems employed by telecommunications carriers, and with the standards, guidelines, protocols, and interfaces that are employed for the electronic exchange of data between back-office systems, including Connect:Direct, Electronic Data Interexchange ("EDI"), Exchange Message Interface ("EMI"), Exchange Message Record ("EMR"), and Carrier Access Billing Systems ("CABS").

3. LCI has been offering local telephone services on a resale basis in Ameritech's region since October of 1996. LCI started its resale efforts first in Illinois, followed by Ohio and Michigan in March of 1997, with plans to expand into the entire Ameritech region. Currently LCI has approximately 300 resale customers in Ameritech's region, all of which are small businesses, typically with two to 20 lines.

4. LCI's business plan for providing local services called for it to enter first as a reseller in selected geographic markets in which LCI had an established long distance customer base. Ameritech's region is just such a market. In Michigan, for example, LCI is the fourth largest long distance carrier and, as of late 1996, had approximately 75,000 residential and 15,000 business customers.

5. After establishing its systems and procedures for providing local services, LCI's plan is to transition as quickly as possible from a reseller to providing local services through its own network platform comprised of unbundled network elements ("UNEs") purchased from the ILECs. LCI has already started to proceed with that plan by making requests to several ILECs, including Ameritech, to provision and test a combination of network elements consisting of loops, unbundled switching, and interoffice transport. I have been involved in meetings with Ameritech representatives on this subject, but, to date, Ameritech has refused LCI's request to provision and test the network platform requested by LCI.

6. During the course of my job, I have become familiar with Ameritech's OSS, and with the interfaces that Ameritech has made available to its OSS. To date, LCI has encountered a number of problems with, and limitations in, Ameritech's OSS that discriminate against LCI in its resale efforts. These problems, which I will discuss below, are inherent in the databases, underlying systems, and procedures that comprise Ameritech's OSS. These issues will not be

cured or eliminated through the use of electronic interfaces. Indeed, I anticipate that these problems will be compounded by LCI's switch to electronic access, since LCI's order volume will increase, particularly when LCI begins to sell local services to residential customers.

7. Although LCI has established an electronic link with Ameritech for the exchange of billing and customer usage information, to date, LCI has been accessing all other functions of Ameritech's OSS manually, via facsimile machine. LCI requests Customer Service Records ("CSRs") by facsimile machine, and, in turn, receives those records back from Ameritech by fax. This is also how LCI currently places its orders.

8. One of the problems that LCI has encountered has been Ameritech's refusal to provide LCI with up-to-date and accurate access to its Universal Service Order Codes ("USOCs"). The USOCs are the basic language in the local telecommunications industry to order, provision, and bill products and services. This language was originally standardized by BELLCORE, but due to State Public Utilities Commissions rulings and other regional differences, non-standard USOCs have been implemented. These USOCs can only be deciphered by the specific RBOC that created them. There are approximately 300,000 root USOCs. When additional parameters are added by the RBOCs, such as whether the product is resaleable or not, whether there are contract terms, whether it is business or residential, State to State variances, etc., a unique language has been created that is only understood by each specific RBOC. This means that only Ameritech can provide information on the ordering, provisioning, and billing USOCs that its employees understand and use on a daily basis.

9. The Long Distance market did not require the passing of USOC information from carrier to carrier. It was not until the Competitive Local Exchange Carriers ("CLECs"), such as LCI, entered into the local exchange marketplace that a need to be familiar with the industry standard and non-standard USOCs existed. In order for LCI to provide local services, Ameritech is required to furnish LCI with a CSR for each of LCI's potential customers. Ameritech provides the CSR in varying formats (we have seen 4 different formats, thus far). I have attached an example as Exhibit A. All of Ameritech's CSR formats are free-form text, which makes them difficult to read, either manually or electronically. Some of the CSRs provide the English

translation to the USOC, while others do not. None of the CSRs provide any information on whether a particular USOC is resaleable or not. Without this information, LCI's resale efforts are disadvantaged because LCI cannot determine with any accuracy the type of service a customer currently has, whether that service is a resaleable product, or whether that service is subject to any special contractual commitments. This has led and will continue to lead to ordering and provisioning problems and delays for LCI and its new customers -- problems that Ameritech itself does not face because obviously it has access to its own up-to-date USOCs. (While the attached CSR example, Exhibit A, was received from Ameritech via electronic mail, Ameritech has informed LCI that it intends to provide LCI with CSRs in basically the same format over its EDI interface.)

10. LCI's access to accurate and up to date USOC information is critical to LCI's ability to provide local services to its customers. LCI has repeatedly asked Ameritech for access to this vital information. As recently as May 30, 1997, I had a telephone conversation with Mr. Neil Cox of Ameritech in which he told me that all of the USOC information was available on Ameritech's Reseller WEB site. Immediately after this call, I logged on to the site. The only USOC data available to me was for Illinois (and this data was incomplete). I then spoke with Mr. Joe Rogers of Ameritech on June 4, 1997 (three business days later). During this conversation, Mr. Rogers informed me that Ameritech was still working on providing its USOC information via the WEB site. I accessed the WEB earlier today and received the following message while trying to retrieve USOC data for Indiana, Wisconsin, Michigan and Ohio: "Sorry, data for this State is currently under construction and not yet available."

11. LCI is currently in the process of implementing and testing Ameritech's EDI interfaces for resale ordering. LCI obtained the specifications for those interfaces in late 1996, but did not, at that time, have software that was compatible with those interfaces. Thus, LCI has had to hire software programmers to develop the appropriate interfaces. LCI did not receive from Ameritech, until approximately April of 1997, the extensive manuals (consisting of over 4,000 pages) that detail, among other things, the business rules established by Ameritech to govern the operation of these interfaces. Thus, even if LCI had already had software compatible

with Ameritech's EDI interfaces, it was only within the past few weeks that Ameritech provided the information necessary for LCI to efficiently and effectively utilize those interfaces.

12. As stated above, LCI already has an electronic interface with Ameritech for billing and customer usage data. However, Ameritech has failed repeatedly to provide LCI with timely transmissions and accurate customer usage information. Ameritech systems have access to customer usage information immediately after a call is made. However, LCI does not have access to much of this data for at least 72 hours. In many cases it takes much longer. The usage file for May 14, 1997 was missing a large amount of data. This data was finally sent to LCI on May 24, 1997. Ameritech implemented a change to their CAMPS extraction logic that caused the usages files for May 17th & May 19th not to be sent. This data was slowly sent to LCI over the following week. LCI is now missing a significant amount of data from the May 21st usage file. This data has yet to show up and LCI had to run its billing cycle to invoice its customers without this data. LCI will have to back bill this usage, when we get it.

13. Another customer usage problem occurs because Ameritech's OSS contains at least two separate billing systems, an old system for accounts with grandfathered products, and a new system for new products and services. In order for LCI to receive usage information on its customer accounts, Ameritech has told us that the accounts must be on the new billing system. Unfortunately, the old billing system is not compatible with the new system. Therefore, when LCI sells its local services to a customer that is under the old billing system, Ameritech is unable to provide the usage data to LCI for that customer, which in turn, prevents LCI from providing an accurate bill to the customer.

14. This problem has been encountered with several of LCI's new customers. It is a problem that has occupied a tremendous amount of LCI's staff and management time, and it has also caused at least one of LCI's new accounts, a small hospital, to switch back to Ameritech's service, where this type of billing problem never existed in the past. Specific examples of customers that have been affected by this problem of multiple Ameritech billing systems are discussed in greater detail in a May 22, 1997 letter from Anne Bingaman, President of LCI's Local Services Division, to Neil Cox, President of Ameritech Information Industry Services, a

copy is attached as Exhibit 2 (excluding the exhibits that were sent with the letter). Ironically, while LCI is having difficulty gaining access to some of our customer usage information, we have begun to see usage data for customers that have not been provisioned to LCI's local services. So far, Ameritech has been unsuccessful at determining why this data is being sent to LCI.

15. Still another issue occurs with the monthly billing tapes sent by Ameritech in its AEBS format. Since our relationship began with Ameritech, LCI has never received this data within Ameritech's stated service level of within 10 business days after the close of their billing cycle. While Ameritech has stated that delays in this data should not have an impact on LCI's ability to invoice its customers, this transmission is the only source of "time and materials" information for LCI's customers. If an Ameritech technician is dispatched to an LCI customer, LCI is charged by Ameritech on a time and materials basis. If LCI then wants to bill its customer for these charges, it must wait for the data to show up on the monthly transmission. In contrast, Ameritech billing systems have immediate access to this data throughout each day of the month. Delayed data from Ameritech adversely impacts LCI's commitment to timely and accurate bills to its customers. It also impacts LCI's ability to provide billing services to its customers that are equal to the billing services Ameritech provides its customers.

16. Another serious problem that LCI has only recently begun to confront is a special marketing program called "ValueLink" that Ameritech has used to lock-in business customers to long-term contracts for combined local and intraLATA toll service. We have been advised by Ameritech representatives that because of limitations in Ameritech's billing system, LCI cannot sell local services to ValueLink customers because the customer's local service and intraLATA service are inextricably linked in Ameritech's billing system; consequently, if a customer were to chose LCI for local and long distance service, but wished (in a 2 PIC state, such as Michigan) to keep its intraLATA toll service with Ameritech, it would, nevertheless, continue to get billed for local services by Ameritech.

17. This limitation in Ameritech's billing system forecloses to LCI what we believe is a substantial share of the business market in its region, and imposes an unreasonable restriction on LCI's ability to resell local services. Our sales representatives are finding about 35-40%

of the business customers they have contacted are under ValueLink contracts (LCI has asked Ameritech for confirmation if this percentage is accurate, but Ameritech has not responded).

The anticompetitive effect of this restriction is further compounded by the fact that Ameritech, to date, has advised LCI that if it resells services to a ValueLink customer, LCI must either assume the customer's contractual liability (leaving LCI at risk if the customer terminates its services), or pay off the contract penalties, which in some cases, could amount to thousands of dollars.

18. LCI has objected to the ValueLink program in writing to Ameritech on several occasions (see Exhibit B and a May 2, 1997 letter attached as Exhibit C), most recently in a letter dated June 5, 1997 from Ms. Bingaman to Mr. Cox (attached as Exhibit D, excluding exhibits to the original letter). As of the date of this affidavit, LCI has received no response from Ameritech. This is adversely impacting LCI's business, because we currently have on hold several orders that cannot be submitted until this issue is resolved.

19. Another problem recently discovered by LCI is long-term contracts for Centrex service that Ameritech has with small businesses, typically with fewer than 20 lines -- the very type of business customer to which LCI is marketing service. LCI sales representatives have encountered 50 separate instances where potential customers have advised LCI that they cannot consider using LCI's service because of long-term contractual commitments to Ameritech; more than 20 of the customers had contracts that ran for seven year terms. LCI has also objected to Ameritech about these long-term contracts (see Exhibit B), which were the ValueLink contracts, as they unreasonably restrict LCI's resale efforts.

20. None of the problems identified above will be solved through LCI's use of Ameritech's proposed electronic OSS interfaces. Moreover, during the early testing and implementation of those interfaces, LCI has observed certain limitations that will deny it parity of access with Ameritech, once LCI begins commercial use of these interfaces.

21. Under Ameritech's existing EDI system, LCI will not have access to status reports in Ameritech's internal systems that track ordering and billing. Without access to LCI accounts in Ameritech's internal systems, LCI will continue to lack the ability to resolve problems proactively. Electronic interfaces do not by themselves guarantee that an order successfully has

navigated all the systems necessary for routing usage and billing information to LCI. For example, an order may complete the ordering process successfully, but fail in Ameritech's message guide system. Without access to the guide system, which Ameritech itself has, LCI will have to monitor line usage by customer to confirm that Ameritech properly has filled the LCI order. Based on the customer usage problems stated above, LCI is continually in a "wait and see" mode when it comes to verifying that our customers have been provisioned correctly. We have no insight or ability to proactively tackle defects or errors in Ameritech's provisioning & customer usage process.

22. Ameritech's EDI interface also will not support the ordering of unbundled network elements ("UNEs"). For UNEs, Ameritech plans to maintain a wholly separate process, which will incorporate pieces of its Access Service Requests ("ASR") and EDI systems, but will not follow EDI guidelines. This will require LCI to build another application and gateway to order UNE products.

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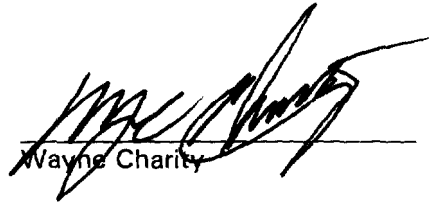
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**Affidavit of Wayne Charity on  
Behalf of LCI Int'l Telecom Corp**


23. For the reasons identified above, Ameritech is not providing LCI with nondiscriminatory access to Ameritech's OSS, nor is LCI currently at parity with Ameritech with respect to certain OSS functions. It is apparent from just the few months that LCI has been doing business in Ameritech's region that because of limitations in Ameritech's OSS, LCI cannot provide equal service to certain of its customers.

I hereby swear, under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct, to the best of my knowledge, information and belief.

  
Wayne Charity

On this 9<sup>th</sup> day of June, 1997, before me personally came Wayne Charity, to me known, being duly sworn, did depose and say that he is the individual described in this Affidavit.

On this 9<sup>th</sup> day of June, 1997,

  
Notary Public

My commission expires



**SHERRI L. RONNEBAUM, ATTORNEY AT LAW**  
NOTARY PUBLIC, STATE OF OHIO  
My commission has no expiration date.  
Section 147.03 R.C.





**EXHIBIT 1**

## Ameritech Customer Service Record (CSR) Example

Started to work at = 05/16/97 08:18:03

Requested Account = 312 294-6310

Requested State = IL

Customer Service Record follows:

ZBU EB, 000-200

CENT T3

---LIST

LN

LA

LOC

SIC

BN1

BA1

PO

SS NONE

TAR NONE

SPP (A)VT1/NOL G 07

/TA 60, 02-12-97/SED 02-12-97

HTG A 294-6310-6321

BG 1

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/LPCA BO, 02-12-97/CTX 0155:0

/LCC IBN/HTG A/CAT 3

/LOC SUI 1704/LSO 312 294

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---	-------------------	-----	-----

1	ZCSAC/TN 294-6310	.00	.00
---	-------------------	-----	-----

1	ZCVLD/TN 294-6310	.00	.00
---	-------------------	-----	-----

1	NUM/TN 294-6310/SPP (A)	SPB	.00
---	-------------------------	-----	-----

1	UXTBU/TN 294-6310	SES	.00
---	-------------------	-----	-----

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1	UXTBU/TN 294-6318	SES .00
	STATION TOTAL	5.09
1	SXPAA/TN 294-6319/PIC LGT	5.09 5.09
/PCA BO, 02-12-97/ZPIC A13		
/LPCA BO, 02-12-97/CTX 0155:0		
/LCC IBN/HTG A/CAT 3		
/LOC SUIT 1704/LSO 312 294		
1	ZXAPU/TN 294-6319/CPG 6310	.00 .00
1	ZCFV1/TN 294-6319	.00 .00
1	ZCSAC/TN 294-6319	.00 .00
1	ZCVLD/TN 294-6319	.00 .00
1	NUM/TN 294-6319/SPP (A)	SPB .00
1	UXTBU/TN 294-6319	SES .00
	STATION TOTAL	5.09
1	SXPAA/TN 294-6320/PIC LGT	5.09 5.09
/PCA BO, 02-12-97/ZPIC A13		
/LPCA BO, 02-12-97/CTX 0155:0		
/LCC IBN/HTG A/CAT 3		
/LOC SUIT 1704/LSO 312 294		
1	ZXAPU/TN 294-6320/CPG 6310	.00 .00
1	ZCFV1/TN 294-6320	.00 .00
1	ZCSAC/TN 294-6320	.00 .00
1	ZCVLD/TN 294-6320	.00 .00
1	NUM/TN 294-6320/SPP (A)	SPB .00
1	UXTBU/TN 294-6320	SES .00
	STATION TOTAL	5.09
1	SXPAA/TN 294-6321/PIC LGT	5.09 5.09
/PCA BO, 02-12-97/ZPIC A13		
/LPCA BO, 02-12-97/CTX 0155:0		
/LCC IBN/HTG A/CAT 3		
/LOC SUIT 1704/LSO 312 294		
1	ZXAPU/TN 294-6321/CPG 6310	.00 .00
1	ZCFV1/TN 294-6321	.00 .00
1	ZCSAC/TN 294-6321	.00 .00
1	ZCVLD/TN 294-6321	.00 .00

1	NUM/TN 294-6321/SPP (A)	SPB	.00	
1	UXTBU/TN 294-6321	SES	.00	
	STATION TOTAL	5.09		
1	SXPAA/TN 294-6322/PIC LGT	5.09	5.09	
	/PCA BO, 02-12-97/ZPIC A13			
	/LPCA BO, 02-12-97/CTX 0155:0			
	/LCC IBN/CAT 3/LOC SUIT 1704			
	/LSO 312 294			
1	ZXAPU/TN 294-6322/CPG 6310	.00	.00	
1	ZCFV1/TN 294-6322	.00	.00	
1	ZCSAC/TN 294-6322	.00	.00	
1	ZCVLD/TN 294-6322	.00	.00	
1	NUM/TN 294-6322/SPP (A)	SPB	.00	
1	UXTBU/TN 294-6322	SES	.00	
	STATION TOTAL	5.09		
1	SXPAA/TN 294-6323/PIC LGT	5.09	5.09	
	/PCA BO, 02-12-97/ZPIC A13			
	/LPCA BO, 02-12-97/CTX 0155:0			
	/LCC IBN/CAT 3/LOC SUIT 1704			
	/LSO 312 294			
1	ZXAPU/TN 294-6323/CPG 6310	.00	.00	
1	ZCFV1/TN 294-6323	.00	.00	
1	ZCSAC/TN 294-6323	.00	.00	
1	ZCVLD/TN 294-6323	.00	.00	
1	NUM/TN 294-6323/SPP (A)	SPB	.00	
1	UXTBU/TN 294-6323	SES	.00	
	STATION TOTAL	5.09		
1	NG3	.20	.20	
1	CYA1X/SPP (A)	5.00	5.00	
*****STATION ELEMENT SUMMARY				
BG ALL				
SUBJECT TO TRUNK EQUIV				
ACT EQUIV				
14	2.00 E911 CHARGE	1.25	2.50	
	STATION ELEMENT SUMMARY TOTAL	2.50		
BG 1				
SUBJECT TO TRUNK EQUIV				
ACT EQUIV				
14	2.00 INTERSTATE ACCESS CH	4.01	8.02	
SUBJECT TO PER STATION RATE				
14	TELECOMMUNICATIONS RELAY SERV	.00	.09	
	STATION ELEMENT SUMMARY TOTAL			
8.11	TOTAL EXCLUDING TAXES			
194.87				

--- end of CSR report at 05/16/97 08:18:09---



## EXHIBIT 2





# **LCI International®**

## **Worldwide Telecommunications**

Anne K. Bingham  
Senior Vice President  
President, Local  
Telecommunications Division

May 22, 1997

**HAND DELIVERED**

Mr. Neil Cox  
President  
Ameritech Information Industry Services  
350 North Orleans, Floor Three  
Chicago, IL 60654

Dear Neil:

I write to make you personally aware of the continuous stream of problems that LCI has encountered working with Ameritech to provide competitive local service in your region in spite of the best efforts of your line staff. The problems appear to be the direct result of legal, marketing, and staffing decisions made at upper management levels, which is why I am addressing this letter to you. Attached you will find 28 documents:

- 25 letters in chronological order, 10 drafted by me and the remaining 15 drafted by my staff, come first.
- Two faxes from Ameritech's Michael O'Sullivan follow the letters. I note in this regard that while Mr. O'Sullivan recently forwarded these faxes to LCI, he never has responded in writing to LCI letters. I can only conclude from this paucity of documentation that Ameritech is either grossly and seriously understaffed; or that Mr. O'Sullivan is following a deliberate Ameritech policy of putting as little as possible in writing while its various 271 applications are pending. In either case, LCI has been greatly frustrated by the lack of action as detailed below, or even the courtesy of a written response from Ameritech.
- The Ohio resale agreement between Ameritech and LCI is the final attachment, addressed below.